

U.S. Department of the Interior – Bureau of Reclamation

SAN LUIS DRAINAGE FEATURE RE-EVALUATION

Meeting Summary Interagency Scoping Workshop October 25, 2001 - Sacramento, CA

Introduction

The U.S. Bureau of Reclamation (Reclamation) hosted an Interagency Scoping Workshop for the San Luis Drain Re-evaluation in Sacramento on October 25, 2001. Marian Echeverria, Reclamation, and John Clerici, Public Affairs Management, facilitated the meeting.

M. Echeverria opened the workshop with a discussion of goals. The goals for the meeting were: 1) to discuss key project components, 2) discuss agency roles, 3) give an overview of public involvement activities, and 4) give an overview of project work plan. Workshop participants added the following goals for this meeting and the overall project: 1) coordinate with parallel programs in the San Joaquin Valley, 2) avoid environmental impacts, and 3) utilize prior study models and findings.

Project History

Mike Delamore, Reclamation, provided a brief history of the San Joaquin Valley / San Luis Unit (SLU) drainage issues. He reviewed text of the San Luis Act and proceeding hearings, reports, and decisions.

Questions and Comments (Q / C)

- (C) This is a larger project area than was discussed at the Fresno workshop. There is a need to talk about a broader study/impacts area beyond the SLU.

Key Project Components

Project Scope

Jason Phillips, Reclamation, reviewed the project scope. He noted the language within the court order to Reclamation stating “...**Reclamation...shall without delay, provide drainage to the San Luis Unit**, pursuant to the statutory duty imposed by section 1(a) of the San Luis Act” (April 2001).

Geographical Area

J. Phillips defined the area under consideration by Reclamation that actually exceeds the court order. Reclamation must look at other potential needs of the area.

Questions and Comments

- (Q) Why include Grasslands since they already have an outlet?

Response: The Grasslands project is only a short-term project. It is an extension of a pilot project with a termination date of 2010. Additionally, a long-term drainage plan is a requirement for Grasslands under the project Environmental Impact Statement (EIS).

- (Q) Is there an option to work with Congress to undo the San Luis Act to reflect reality?

Response: Congress can vote to “undo” the San Luis Act, but Reclamation cannot lobby for any change in the legislation.

Purpose and Need Statement

J. Phillips presented the Purpose and Need Statement emphasizing the main goals that Reclamation is looking to achieve. “The purpose of the re-evaluation is to formulate and implement a plan to provide drainage service to the San Luis Unit to achieve long-term, sustainable salt and water balance in the root zone of irrigated lands.”

Questions and Comments

(C) The “need” part of the statement must be clarified. Expand the “need” language and separate it from the “purpose.”

(Q) Under the discretionary actions of the ruling, drainage is part of the purpose. Why is there no mention of eliminating the source of the problem?

Response: The assumption is that drainage is necessary.

Definitions of “Drainage Service”

J. Phillips presented definitions of drainage, drainage management, and drainage service. He also reviewed a drainage water cycle that communicated the path of drainage water from a management system to various treatment/disposal methods. A pie chart demonstrated the division of “Problem Water” into two categories, Drainage Service and Drainage Management.

Questions and Comments

(C) Drainage definition, as presented, is an objective not a definition. Some possibilities for alternative definitions are:

4. The art/science to remove water from land.
5. Drainage systems in engineering systems remove water from the system.
6. Agricultural drain to remove and dispose of excess water.
7. Removal of excess water and salt to allow crop growth.

We need to focus on the removal of salt and water. Other constituents also warrant consideration (e.g. boron).

(C) In considering drainage management, actions taken should include capital improvements as well as farming methods.

(Q) Are the measurements in the Rainbow Report considered, e.g., land retirement?

(Q) Drainage management, land retirement, and limits on water delivery are strategies to reduce (or eliminate) the need for drainage. Not including land retirement within drainage service alternatives creates an incomplete picture.

(Q) Does the court order provide latitude on the amount of drainage service provided?

Response: If an analysis showed that no demand for drainage, that analysis would probably have to go back to courts.

(Q) Who ultimately pays for the project? The range of alternatives should weigh different cost estimates for feasible land use demands.

Response: Reclamation is currently under existing authorization to complete drainage projects. Current appropriations do have a ceiling. Those funds are reimbursable, so the cost for the project would be part of drainage fees.

(Q) Does the court order limit Reclamation from working on a broader base to include other state and federal agencies? What about the recent “Boyle” effort? Could Reclamation join the MOU between State Water Resources Control Board and Westlands Water District?

Response: It is important for Reclamation to work with other agencies.

- (C) The EIS must deal with the entire “pie.” In order to deal with drainage service, one must consider drainage management.
- (C) The relationship between drainage service and drainage management will define how alternatives are developed. An increase in land retirement would result in a decreased demand for drainage. However, the assumption is that a demand for drainage will persist.
- (C) If land retirement were the preferred action, how would properties be managed?
 - (C) Some growers may actually go out of business during this planning process. Economic impacts to surrounding communities require consideration.

Screening Criteria

Patricia Roberson, Reclamation, reviewed the initial screening criteria developed to evaluate drainage service options. Initial screening may be: 1) Does the option provide drainage service? 2) Is the option technically demonstrated? and 3) Can the option be achieved given current environmental regulations?

Questions and Comments

- (Q) Is this a problem because it is not economically feasible? Reclamation needs to establish economic criteria. What if cost of drainage service is more than crop value?
 Response: San Luis Act assumes that agriculture is present and requires drainage. Reclamation’s responsibility is to provide drainage service.
- (C) Decreasing water use, increasing on-site water management, and other strategies may eliminate the need for drainage service.
- (Q) Does the size of drainage demand affect options?
- (C) Evaporation ponds are disposal not treatment.

Drainage Options

Scott Irvine reviewed the development of drainage options. The drainage options discussed included discharge to delta/ocean, agroforestry, evaporation ponds, desalinization treatment, selenium removal, deep well injection, and landfill disposal.

Questions and Comments

- (Q) Can the true economic cost of these options be documented? The government will bear the initial costs. What assurances exist to guarantee payment by those using the service?
 Response: Cost for service will include reimbursement for initial project costs.
- (C) The Rainbow Report was not a long-term solution.

Discharge to delta/ocean:

- (C) Consider isolation of salts by evaporation and then transport by boat to ocean. This would eliminate the need for installation of a pipe out to the ocean.
 - (C) Analyze potential beneficial uses for salts and economic benefits.
 - (C) Consider the bioaccumulation issues and the potential ecological impacts.
 - (C) Analyze Selenium input according to the latest science, not just the current regulations.
- (C) A pipe discharging drainage water out to the delta or ocean would create a point source for pollution and would require permits.

Agroforestry:

- (C) The term “agroforestry” is outdated; consider a more accurate phrase (e.g., IFDM).

Evaporation Ponds:

- (C) Consider the use of solar evaporation, as distinct from evaporation ponds.

Desalinization Treatment:

- (C) Desalinization treatment is a potential solution for partial or whole product treatment.

Selenium Removal:

- (C) Biological, Chemical, and Physical treatment options exist for Selenium removal. Consider final goals for concentration levels.
- (C) Remember to consider the available Selenium research because regulations do not reflect current findings.
- (C) Selenium is a useful element. Explore options to use extracted Selenium.

Alternatives Development

Steve Hatchett, WRE, presented the alternative development process. S. Hatchett also reviewed an example matrix to evaluate alternatives.

Questions and Comments

- (Q) Where did the drainage rate figure of 0.5AF/acre come from?

- (Q) Would Selenium, salt, boron, etc. amounts be included?

Response: Yes.

- (Q) Explain how Annual Volume is determined.

Response: The basis for the original figure is from the SLU service area.

- (Q) Will you complete a GIS evaluation?

- (Q) How do you compel farmers to adopt certain practices? How do you get farmers to plant salt tolerant crops versus cash crops?

Response: Reclamation would work with water districts to determine the need for drainage service. From that determination, users would make their own decisions on what is most economical for their operation.

- (C) Some areas have already implemented blending methods to mix the drainage water with fresh water.

- (C) Consider land retirement as an alternative.

- (Q) What is the incentive to SLU users to reduce drainage in light of the Court order?

Response: The incentive lies in their desire to stay in business. In addition, limited treatment capacity will encourage use of one-site management.

- (Q) Are drainage rates regional? Do rates include consideration for upslope/downslope variations in efficiencies?

Response: Rates are regional and the efficiencies are averaged.

- (Q) Could drainage of constituents be evaluated and then base rates on the “type” of waste generated? This would introduce a quantity and quality limit.

Response: This could be a reasonable option to initiate an incentives based structure.

- (C) Consider weather impacts to drainage quantities from wet and dry years.

- (Q) Would Reclamation treat high selenium areas differently? In Grasslands, they have load limits.

Response: Reclamation could handle this situation in two ways: 1) Set quality limits or 2) Reclamation would not consider certain areas.

- (Q) Farmers will need alternative practices to manage problem areas. Would technical assistance be available to determine proper techniques?

Response: A partnership with other agencies (e.g. Natural Resources Conservation Service, UC Cooperative Extension, etc.) could provide local technical assistance for farmers.

- (C) Early consultation for Endangered Species Act is optimal.

Analytical Tools

S. Hatchett explained the tools used to evaluate alternatives with an appropriate level of detail.

Questions/Comments

- (Q) What about river/delta models to determine ecological effects?
 - (Q) What is your plan for data gathering and accuracy? To ensure quality results, lots of accurate data is required.
 - (C) Build a Quality Assurance/Quality Control plan into the tool selection.
 - (C) Department of Water Resources has information on San Joaquin Valley area available. DWR also has an available tool to determine efficiency.
 - (C) US Fish & Wildlife Service is available to assist in developing monitoring programs.
 - (Q) How will you determine alternatives as feasible if not proven?

Response: Those alternatives may fall out.

Environmental Compliance

Don Treasure, Reclamation, reviewed the NEPA milestones set out by Reclamation and by the Court order.

Questions/Comments

- (Q) Researchers have found adverse impacts to endangered species in Suisun Bay due to high Selenium concentrations. Is there a water quality goal set for discharge into Delta?
 - Response: Reclamation is aware that discharge into the Delta is a complex and important issue.
- (Q) What about compliance with the California Environmental Quality Act? Why not complete a joint document for both CEQA and NEPA?
 - Response: Reclamation is a federal agency so this project is subject to the NEPA process. Reclamation will structure studies and reports so they are adaptable to CEQA. At this point, no state agency has expressed interest in being a lead, and the Court order is directed only to Reclamation.

Public Involvement Activities

M. Echeverria outlined a plan to coordinate closely with other agencies and to encourage input from all stakeholders.

Questions/Comments

- (C) Involve all Congressional Districts in the Delta area.
- (C) Schedule activities between scoping process and Draft EIS to retain engagement of agencies and public.
- (C) Develop a list serve and possibly, a private chat room, to keep agencies informed.
- (C) Respect that the issue of impacts to community if land retirement occurs is an Environmental Justice issue.

Work Plan

Reclamation distributed draft copies of the Work Plan for review. Participants had an opportunity to give comments. Reclamation also requested that participants submit additional input via email by November 8, 2001 to jphillips@mp.usbr.gov.

- (C) Process should rely on Rainbow Report.

Response: Reclamation will utilize the Rainbow Report and other reports to the maximum extent possible. The focus of this Re-evaluation will be on the ultimate disposal of salts.

- (C) Consider new technologies since the Rainbow Report.
- (C) Joe Scarupa, USF&WS Contaminants Division, is completing the third year of a three-year study to develop Best Management Practices for drainage properties (if possible). Reclamation should contact Joe for more information.
- (C) Work Plan should reference more existing technical reports. The SJIDP has numerous reports available.

Action Items

- § Develop smaller focus groups to discuss specific topics as need arises.
- § Expand agency attendance at interagency meeting to include CDFG, NFMS, CALFED, etc...
- § Invite representatives from the farming community and Water Districts to address the group.